# UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA

Chanter 7 Rankruntev

| III 1C.   | Chapter / Bankraptey                        |  |
|---|---|--|
| BRUCE FARLOW,   | Case No: 8:18-bk-06677-MGW                  |  |
| <b>Debtor.</b>  |   |  |
| JOHN D. GENTIS, SHALIMAR MHP, LLC,<br>a Florida limited liability company, and GFB<br>PARTNERS, LLLP, a Florida limited liability<br>limited partnership, |   |  |
| Plaintiffs,   |   |  |
| v.  | Adversary Proceeding No.: 8:18-AP-00575-MGW |  |
| BRUCE L. FARLOW,  |   |  |
| <b>Defendant.</b>   |   |  |

## PLAINTIFFS' FACT AND EXPERT WITNESS LIST

Plaintiffs John D. Gentis, Shalimar MHP, LLC, and GFB Partners, LLLP through their undersigned attorney, file their Fact and Expert Witness List and state:

### I. Fact Witnesses

In re-

Plaintiffs may call some or all of the following witnesses, either live or by deposition, who are expected to testify on the following subject matters:

| 1. | John Gentis  |
|----|--|
| 1. | c/o W. Andrew Clayton, Jr  |
|    | · ·  |
|    | Icard Merrill Cullis Timm Furen & Ginsburg   |
|    | 2033 Main Street, Suite 600  |
|    | Sarasota, FL 34237   |
|    | <b>Substance:</b> Testifying regarding all events surrounding the issues detailed in the complaint including the unauthorized withdrawal of monies from Shalimar and GFB and unauthorized credit card charges used for Mr. Farlow's benefit. |
| 2. | Bruce Farlow   |
|    | c/o Timothy Gensmer  |
|    | Timothy W. Gensmer, P.A.   |
|    | 2831 Ringling Blvd, Suite 202-A  |
|    | Sarasota, FL 34237   |
|    |  |
|    | <b>Substance:</b> Testifying regarding all events surrounding the issues detailed in the   |
|    | complaint including the unauthorized withdrawal of monies from Shalimar and GFB  |
|    | and unauthorized credit card charges used for Mr. Farlow's benefit.  |
|    | and unauthorized credit card charges used for IVII. I allow 8 benefit.   |
| 3. | Rachel Saffold   |
|    | North River Homes  |
|    | 7006 36 <sup>th</sup> Street East  |
|    | Ellenton, FL 34222   |
|    | Eliciton, I L 54222  |
|    | Substance: Ms. Saffold will provide Testimony regarding Bruce Farlow's improper  |
|    |  |
|    | use of corporate funds.  |
|    |  |
| 4. | Records Custodian, AT&T.   |
|    |  |
| 5. | Records Custodian, Costco.   |
| 6. | Records Custodian, Bank of America.  |
| 7. | All witnesses listed or called by Defendant.   |
| /• | All withesses listed of called by Defendant.   |
| 8. | All necessary rebuttal witnesses.  |
|    |  |

# II. Expert Witness

Plaintiffs may call the following witness, either live or by deposition, who is expected to testify on the following subject matters:

1. Plaintiffs do not intend on calling an expert to testify at this time.

Plaintiffs reserve the right to amend or supplement this Fact and Expert Witness List with additional witnesses as may be discovered, disclosed, or as may become available or apparent during discovery or other proceedings in this action.

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of June, 2019 the foregoing was filed with the court and served upon counsel of record via the CM/ECF system:

## ICARD, MERRILL, CULLIS, TIMM, FUREN & GINSBURG, P.A.

By: <u>W. Andrew Clayton, Jr.</u>

W. ANDREW CLAYTON, JR. Florida Bar No. 0739464 WORTH S. GRAHAM Florida Bar No. 0092417 2033 Main Street, Suite 600 Sarasota, FL 34237

Telephone: (941) 366-8100 Facsimile: (941) 366-6384

Email: dclayton@icardmerrill.com Email: wgraham@icardmerrill.com